

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 17-81**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 09/12/2017	NEED RESPONSE BY: 09/22/2017
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: Butte	
3. PHONE NO.:	EMAIL:	7. SUBJECT: Residency	
4. REGULATION CITE(S): ACIN I-45-11; 63-300.5		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). 63-500.3(e); ACIN I-45-11	
9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):			

1.) Does the an applicant signing the application, Statement of Facts, or E-APP process under the penalty of fraud and perjury meet the requirements for self-certification of residency after other attempts to obtain verification have failed?
 2.) Will the above mentioned documents signed under penalty of fraud and perjury meet the requirement of self-certification of residency for homeless, recently moved, and migrant/seasonal farmworkers?
 Example: Client applies for CalFresh on 9/1/17 and all required documentation except residency is provided during the interview process. Client signs the Statement of facts at time of interview which lists the address the client reports to be living and no inconsistent information is know to the County. Client is given CW2200 requesting verification of residency and is provided examples of things that will be accepted as proof of residency and it is due on 9/11/17. Client calls on 9/8/17 and states they are unable to provide any of the verifications requested for residency. Do they have to sign an additional affidavit or is the SOF signed at interview considered self-certification?

10. REQUESTOR'S PROPOSED ANSWER:

No proposed answer

11. STATE POLICY RESPONSE (CFPB USE ONLY):

1. No, residency verification is a mandatory verification. If client fails to provide any proof of residency, the CWD must use a collateral contact with a third party. No specific type of verification can be imposed, including requiring third-party contact. The client can submit any proof of address.
 2. Yes, ACIN I-45-11 clearly states in special circumstances like for homeless, recently moved, and migrant/seasonal farmworkers, self-certification is acceptable for migrant farm workers and homeless households if the applicant, with the county's assistance, has made reasonable efforts to obtain verification and verification cannot be obtained and the applicant's statement regarding residency is not questionable. In these conditions a signed application, Statement of Facts, or E-APP process under the penalty of fraud and perjury meet the requirements for self-certification of residency. It is recommended here in case client fails to provide any verifications for residency, CWDs should also offer a help in getting one.

FOR CDSS USE

DATE RECEIVED: 10/04/2017	DATE RESPONDED TO COUNTY/ALJ: 10/10/2017
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